

CORRES. CONTROL
INCOMING LTR NO.

00844 RF 00

DUE DATE
ACTION



Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

SEP 1 1960

00-DOE-03378

[illegible]

Mr. Steve Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Dear Mr. Gunderson:

Enclosed please find minor modification #5 to the final Building 776/777 Decommissioning Operations Plan (DOP). This minor modification is being submitted in accordance with Section 4.5.2 of the DOP and Paragraph 127 of the Rocky Flats Cleanup Agreement (RFCA). The modification includes:

1) Resource Conservation and Recovery Act (RCRA) units to be added to the DOP, and 2) RCRA unit-specific closure information for RCRA units located in Set 55.

Per Paragraph 127 of RFCA, a timeframe of seven days is set for review and approval of minor modifications. Therefore, I ask that your agency review the enclosed information and provide your final approval of the modification within seven days of receipt of this letter.

Thank you for your consideration in this matter. Please call me at 303-966-5918 or Sandi MacLeod at 303-966-3367 if you have any questions or need more information.

Sincerely,

Joseph A. Legare

Joseph A. Legare
Assistant Manager
for Environment and Infrastructure

Enclosure

Reviewed for Addressee
Corres. Control RFP

9/12/00

Ref Ltr. #

DOE ORDER #

**ADMIN RECORD**

000042

~~B776-A-00042~~

S. Gunderson
AMFD:FC:SM:00-DOE-03378

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Dated SEP 11 2000

cc w/enc:

E. Kray, CDPHE

T. Rehder, EPA

M. Aguilar, EPA

S. MacLeod, FCD, RFFO

G. Schuetz, FCD, RFFO

R. DiSalvo, OCC, RFFO

[REDACTED]

cc w/o enc:

D. Grosek, EI, RFFO

D. Shelton, K-H

M. Ferri, K-H

Requested Changes to Building 776/777 DOP

Proposed changes to the DOP are identified by section number. Additions are shown in italics and deletions are shown in strikeout.

- 1) Section 4.5, Table 6, Building 776/777 RCRA-Regulated Units: Please add the following units to Table 6:

Room	RCRA Unit	SET	Description	Status	Proposed Closure
416	777.1	13	Container Storage Area	<i>Permitted (added in RCRA Permit Mod #00-02)</i>	<i>Clean Closure (documenting absence of contamination)</i>
416B	777.1	13	Container Storage Area	<i>Permitted (added in RCRA Permit Mod #00-02)</i>	<i>Clean Closure (documenting absence of contamination)</i>
427	777.1	16	Container Storage Area	<i>Permitted (added in RCRA Permit Mod #00-02)</i>	<i>Clean Closure (documenting absence of contamination)</i>
442 vault	777.1	30	Container Storage Area	<i>Permitted (added in RCRA Permit Mod #00-02)</i>	<i>Clean Closure (documenting absence of contamination)</i>
462	777.1	40	Container Storage Area	<i>Permitted (added in RCRA Permit Mod #00-02)</i>	<i>Clean Closure (documenting absence of contamination)</i>
477/477A	777.1	42	Container Storage Area	<i>Permitted (added in RCRA Permit Mod #00-02)</i>	<i>Clean Closure (documenting absence of contamination)</i>
443	777.1	31	Container Storage Area	<i>Permitted</i>	<i>RCRA Stable/Removal</i>

- 2) Appendix H, RCRA Unit-Specific Closure Information Sheets: Please add the attached closure information sheet and drawing for tanks in work set 55.

Appendix H
B776/777 Closure Project
RCRA Unit Closure Information Sheet

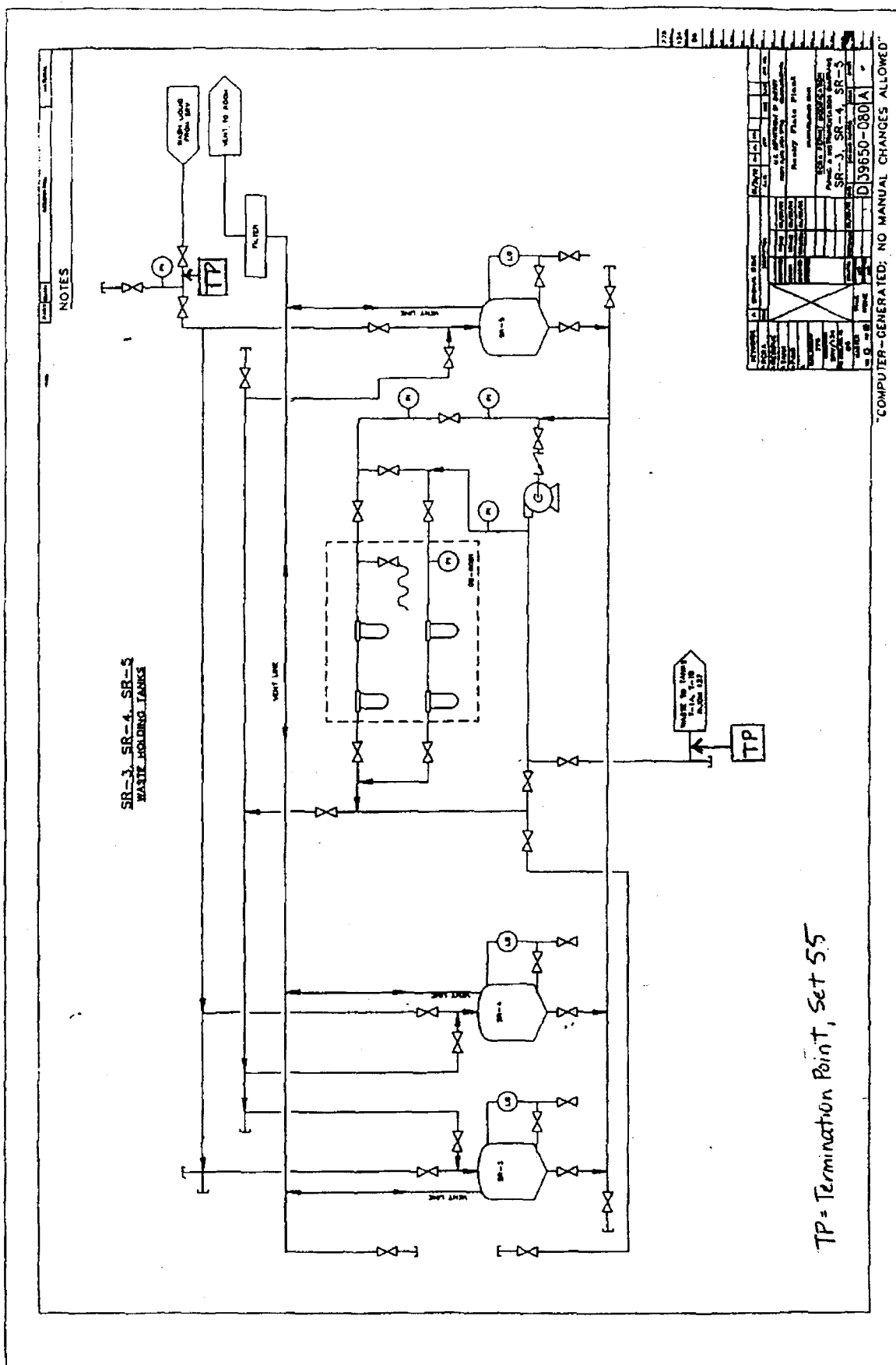
SET	RCRA Unit	Description	Regulatory Status	Closure Status
55	94.001	Tank SRV-3	Mixed Residue	Operationally Empty
	94.002	Tank SRV-4	Mixed Residue	Operationally Empty
	94.003	Tank SRV-5	Mixed Residue	Operationally Empty

Unit Description:	<p>Tanks SRV-3, SRV-4, and SRV-5 (RCRA Units 94.001, 94.002, and 94.003) are raschig ring filled tanks located in Room 134 in Building 776. SRV-3 is 53.5" in diameter by 39.5" high, SRV-4 is 41" in diameter and 40.5" high, and SRV-5 is 42" in diameter by 40.5" high.</p> <p>The three tanks were used to collect wash water generated in the Size Reduction Vault (SRV). The wash water was generated from washing leaded acid-contaminated gloves, filters, and metal tooling in the ball mill washer (RCRA Unit 94.009). Wash water from the SRV was pumped through Ful-flo filters in the vault and transferred to Tanks SRV-3, 4, and 5. From these three tanks the waste was filtered in glovebox GB0001 prior to transfer to Tanks T-1A and T-1B in Room 127 (RCRA Unit 776.2). The SRV tanks have been out of service since 1989. The attached drawing shows a schematic of the tank and ancillary equipment with termination points shown for SET 55.</p> <p>The Building 776/777 Reconnaissance Level Characterization Report says the SRV tanks were brought into the building after the 1969 fire for use in the cleanup operations. The tanks were used to collect water from paint removal and other decontamination efforts. Based on the property inventory numbers, these tanks originally came from Building 881, but there is no indication what they were used for there.</p>
Unit Boundaries and Interfaces:	<p>SET 55 includes Tanks SRV-3, 4, and 5 and ancillary equipment in Rooms 134 and 154. Associated ancillary equipment includes inlet piping coming from the SRV (SET 60, Room 146), filters and piping in glovebox GB-0001, recirculation piping and a pump between the tanks and glovebox, and outlet piping leading to Tanks T-1A and T-1B in Room 127 (SET 69, RCRA Unit 776.2). Secondary containment is provided by GB-0001 and the concrete floor.</p>
EPA Waste Codes/ Waste Characterization:	<p>The tank system collected wash water from the ball mill washer in the SRV, which has been characterized based on process knowledge with EPA waste code D008. (Ref. Backlog Waste Recharacterization, Subpopulation 46B, for SRV ball mill sludge, IDC 340.) Any remaining liquid will be drained from the tanks and piping during deactivation, and sample results from the liquid may be used to determine additional waste codes that may be applicable.</p> <p>The piping and tanks will be characterized in accordance with 6 CCR 1007-3 Part 262.11, and managed accordingly.</p>
Selected Closure Option:	<p>Unit removal without onsite treatment.</p>

Closure Activities:	The tank inlet and outlet piping will be removed to approximately the eight-foot level under a work package for SET 55 deactivation and decommissioning. Raschig rings will be removed from the tanks during deactivation. The tanks and glovebox will be removed under a later work package for SET 55 decommissioning. The remainder of the piping will be removed as part of SET 78 (miscellaneous piping over eight feet), and the concrete secondary containment area will be addressed with SET 82 (building structure).
Waste Disposal:	<p>The tanks, piping, raschig rings, glovebox, and secondary waste (e.g., PPE and plastic containment material) generated during closure activities will be managed as CERCLA remediation waste. Liquid hazardous wastes will be managed as RCRA-regulated wastes. Absorbent will be added to waste packages with items that could contain residual liquids or sludges.</p> <p>Upon final radiological characterization, the waste will be packaged to meet the waste acceptance criteria (WAC) of the approved disposal facility. In the event this waste cannot be shipped directly to the approved disposal facility, it will be stored in an approved on-site storage area until shipment can be scheduled.</p>

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